

Mountain Valley Pipeline, LLC
v. Easements to Construct, et al.

Exhibit 1
To
Plaintiff's Motion for a Preliminary
Injunction Against Tree-Sitters on
MVP Parcel No. VA-MO-022

IN THE UNITED STATES DISTRICT COURT FOR
THE WESTERN DISTRICT OF VIRGINIA
ROANOKE DIVISION

MOUNTAIN VALLEY PIPELINE, LLC,)

Plaintiff,)

v.)

Case No. 7:17-CV-00492-EKD

EASEMENTS TO CONSTRUCT, OPERATE,)

AND MAINTAIN A NATURAL GAS)

PIPELINE OVER TRACTS OF LAND IN)

GILES COUNTY, CRAIG COUNTY,)

MONTGOMERY COUNTY, ROANOKE)

COUNTY, FRANKLIN COUNTY, AND)

PITTSYLVANIA COUNTY, VIRGINIA,)

et al.,)

Defendants.)

VERIFICATION

I, Jeffrey J. Klinefelter, declare as follows:

1. I am Director of Construction for Mountain Valley Pipeline, LLC (“MVP”). In this capacity, I am familiar with location and status of construction for the pipeline.

2. The two tree-sitters on VA-MO-022 (as amended) are preventing MVP from accessing the easements on this tract and clearing the trees. Unless the tree-sitters are removed, MVP will not be able to complete construction of the pipeline at this location, and it will sustain substantial damages.

3. MVP had planned to clear the trees on this tract earlier this year. Due to a proposed route change, however, MVP was unable to complete the work. The route change has now been approved by FERC, but, in the meantime, the tree-sitters have occupied the property and prevented MVP from completing the work.

4. MVP is asking the Court to remove the tree-sitters so MVP can complete its work on this tract.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 28th day of December, 2018.



Jeffrey J. Klinefelter